IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE EQUIFAX, INC. CUSTOMER DATA SECURITY BREACH LITIGATION

MDL DOCKET NO. 2800 1:17-md-2800-TWT

CONSUMER CASES

JOINT MOTION REGARDING PAGE LIMITS

Defendant Equifax Inc., Equifax Information Services LLC, Equifax Consumer Services LLC (collectively, "Defendants"), and Plaintiffs in the Consumer Cases jointly move the Court to extend the page limits for memoranda of law relating to Equifax's forthcoming motion to dismiss the Consolidated Consumer Class Action Complaint ("CCC"). Dkt. No. 374. In particular, Defendants request 70 pages for their memorandum of law in support of their motion to dismiss; Plaintiffs request 70 pages for their opposition to that motion; and Defendants request 35 pages for their reply. In support of this motion, the parties state as follows:

1. The CCC is 556 pages long and asserts 99 claims against Defendants on behalf of 96 individual named plaintiffs. Plaintiffs purport to bring

these claims on behalf of a putative nationwide class and over 50 putative subclasses. Dkt. No. 374, ¶¶ 297, 298, 299, 300.

- 2. Under this Court's Local Rules, a defendant is permitted 25 pages for a memorandum of law in support of a motion to dismiss; a plaintiff is permitted 25 pages for an opposition to a motion to dismiss, and a defendant is permitted 15 pages for a supporting reply. LR 7.1(D).
- 3. Given the length of the complaint, the large number of named Plaintiffs and claims at issue, and the complexity of the issues raised by them, Defendants require additional pages to fully and adequately address the claims asserted in the CCC.
- 4. Plaintiffs and Defendants have conferred and agreed to jointly request that the page limits that would otherwise apply to the briefing on Equifax's motion to dismiss the CCC be extended as follows:
- i. 70 pages for Equifax's memorandum of law in support of its motion to dismiss the CCC;
 - ii. 70 pages for the Plaintiffs' memorandum in opposition; and
 - iii. 35 pages for Equifax's reply memorandum.

THEREFORE, the parties respectfully request that the Court grant this Joint Motion Regarding Page Limits and extend the parties' page limits accordingly. A

proposed Order is attached as **Exhibit A**.

Respectfully submitted this 15th day of June, 2018.

/s/ S. Stewart Haskins II

KING & SPALDING LLP

David L. Balser
Georgia Bar No. 035835
Phyllis B. Sumner
Georgia Bar No. 692165
S. Stewart Haskins II
Georgia Bar No. 336104
Elizabeth D. Adler
Georgia Bar No. 558185
John C. Toro
Georgia Bar No. 175145
1180 Peachtree Street, N.E.
Atlanta, Georgia 30309
Tel.: (404) 572-4600
Fax: (404) 572-5140
dbalser@kslaw.com

Fax: (404) 572-5140 dbalser@kslaw.com psumner@kslaw.com shaskins@kslaw.com eadler@kslaw.com jtoro@kslaw.com

Counsel for Defendant Equifax Inc.

and

/s/ Norman E. Siegel (w/ permission)
Norman E. Siegel
STUEVE SIEGEL HANSON LLP
460 Nichols Road, Suite 200

Kansas City, Missouri 64112

Kenneth S. Canfield **DOFFERMYRE SHIELDS CANFIELD & KNOWLES, LLC**1355 Peachtree Street, N.E.

Suite 1600

Amy E. Keller

DICELLO LEVITT & CASEY LLC

Ten North Dearborn Street Eleventh Floor Chicago, Illinois 60602

Atlanta, Georgia 30309

Consumer Plaintiffs' Co-Lead Counsel

Roy E. Barnes **BARNES LAW GROUP, LLC**31 Atlanta Street
Marietta, Georgia 30060

David J. Worley **EVANGELISTA WORLEY LLC** 8100A Roswell Road Suite 100 Atlanta, Georgia 30350

Consumer Plaintiffs' Co-Liaison Counsel

Andrew N. Friedman

COHEN MILSTEIN SELLERS &

TOLL PLLC

1100 New York Avenue, NW
Suite 500

Washington, DC 20005

Eric H. Gibbs **GIRARD GIBBS LLP** 505 14th Street Suite 1110 Oakland, California 94612

James Pizzirusso **HAUSFELD LLP**1700 K Street NW Suite 650
Washington, DC 20006

Ariana J. Tadler
MILBERG TADLER PHILLIPS
GROSSMAN LLP

One Penn Plaza 19th Floor New York, New York 10119

John A. Yanchunis

MORGAN & MORGAN COMPLEX

LITIGATION GROUP

201 N. Franklin Street, 7th Floor

Tampa, Florida 33602

William H. Murphy III

MURPHY, FALCON & MURPHY

1 South Street, 23rd Floor

Baltimore, Maryland 21224

Jason R. Doss **THE DOSS FIRM, LLC**36 Trammell Street, Suite 101
Marietta, Georgia 30064

Consumer Plaintiffs' Steering Committee

Rodney K. Strong **GRIFFIN & STRONG P.C.** 235 Peachtree Street NE, Suite 400 Atlanta, GA, 30303

Consumer Plaintiffs' State Court Coordinating Counsel

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ S. Stewart Haskins II
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